

Exhibit A

DEFINITIONS

1. “OCLC” refers to Plaintiff OCLC, Inc., and shall include its predecessors and successors in interest, and any and all of its past or present parents, subsidiaries, affiliates, affiliated entities, attorneys, partners, employees, agents, officers, directors, and representatives.

2. “You,” “your,” and “Cloudflare” shall mean and refer to Cloudflare, Inc., and shall include your predecessors and successors in interest, and any and all of your past or present parents, subsidiaries, affiliates, affiliated entities, attorneys, partners, employees, agents, officers, directors, and representatives.

3. “Anna’s Archive” shall mean and refer to Defendant Anna’s Archive, f/k/a Pirate Library Mirror (or “PiLiMi”), and shall include its predecessors and successors in interest, and any and all of its past or present parents, subsidiaries, affiliates, affiliated entities, attorneys, partners, employees, agents, officers, directors, and representatives.

4. “Communication(s)” means any transfer or receipt of information, whether orally or in writing and any evidence of such, including, without limitation, any conversation, discussion, or other exchange of information, whether in person or by means of letter, e-mail, text message, telephone, notes or logs of telephone conversations, daily calendars, diaries, memorandum, telegraph, telex, telecopy, cable, or any other medium, including electronic audio and/or video device or service.

5. The term “document” or “document(s)” is to be given its broadest interpretation and includes (but is not limited to) everything which in the ordinary usage of litigation is a document and includes any medium on which information can be recorded or from which information can be obtained (including electronically stored information). It includes all materials encompassed by the broadest possible interpretation of Rule 34(A) of the Federal Rules of Civil Procedure and those defined in Rule 1001 of the Federal Rules of Evidence. It includes (by way of illustration and not

limitation): drafts and copies bearing notations or marks not found on the original, computer files or data or any kind, audio, video, texts, emails, voicemails, any electronic or any tangible material, whether written, recorded, microfilmed, microfiched, photographed, computerized, reduced to an electronic or magnetic impulse, or otherwise preserved or rendered, papers, agreements, contracts, notes, memoranda, calendars, correspondence, letters, telegrams, telexes, facsimiles, statements, invoices, record books, reports, studies, analyses, minutes, notices, summaries, records, financial statements and records, transcriptions, negotiable instruments, worksheets, ledgers, vouchers, deeds, deeds of trust, photographs, tape recordings, books, pamphlets, catalogues, brochures, extracts, working papers, charts, drawings, graphs, tables, diaries, indices, tapes, wires, films, electronic data processing cards and tapes, recordings, and any and all written, printed, recorded, transcribed, punched, taped, typed, filmed, duplicated, reproduced, or other item or information in your possession, custody, and/or control, including but not limited to originals, file copies, or other copies (no matter how or by whom prepared) that differ in any respect from an original, and all drafts prepared in connection with such materials. For purposes of the foregoing, “draft” refers to any earlier, preliminary, preparatory, or tentative version of all or part of a document, whether or not such draft was superseded by a later draft and whether or not the terms of the draft are the same as or different from the terms of the final documents. The term “copies” means all copies of any documents which are not identical in every respect with the documents being produced.

6. “Including” shall be construed to mean “including but not limited to” as necessary to being within the scope of the Request all responses that might otherwise be construed to be outside of its scope.

7. “Regarding,” “relate to,” “relates to,” “relating to,” and “related to” shall mean referring to, summarizing, reflecting, constituting, containing, concerning, embodying, mentioning, discussing, describing, consisting of, comprising, showing, commenting on, tending

to support or tending to refute, or in any way logically or factually connected with the matter that is the subject of the Request.

8. Unless noted otherwise, all Requests are limited to the time period of January 1, 2020 to present.

DOCUMENT REQUESTS

Request No. 1:

Any and all documents relating to domain hosting or other information or data regarding Anna's Archive, including, but not limited to, domain names, domain owners and registrant information, such as physical addresses, billing addresses, email addresses, and/or phone numbers, domain users, domain IP addresses, and locational information.

Request No. 2:

Any and all documents relating to account information to Anna's Archive, including, but not limited to, contact information, addresses, account domain(s), account information, account username(s), personal identifying information, and corresponding information.

Request No. 3:

Any and all documents relating to IP addresses 104.21.45[.]181, 172.67.218[.]3, 104.21.81[.]53, 172.67.138[.]218, 172.67.169[.]27, 104.21.27[.]97, 172.67.213[.]219, 104.21.50[.]238, 104.21.11[.]109, 172.67.191[.]220, 172.67.133[.]100, 104.21.5[.]121 and domain names annas-archive.org, annas-software.org, annas-archive.gs, annas-archive.se, annas-blog.org, and pilimi.org.

Request No. 4:

Any and all documents related to Anna's Archive, to the extent not addressed by Request Nos. 1, 2, and 3.